

August 1994



Corrective Action Decision/ Record of Decision

OU16: Low Priority Sites

Photograph

CORRECTIVE ACTION DECISION/ RECORD OF DECISION DECLARATION

Site Name and Location

Rocky Flats Plant Operable Unit 16 Low Priority Sites
Golden, Jefferson County, Colorado

Statement of Basis and Purpose

This decision document presents the selected remedial action for the Rocky Flats Plant Operable Unit (OU) 16 Low Priority Sites, located near Golden, Colorado. The selected remedial action was chosen in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, the Colorado Hazardous Waste Act (CHWA) and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). OU16 was investigated and a final No Further Action Justification Document (NFAJD) was approved in compliance with the Federal Facility Agreement and Consent Order signed by the U S Department of Energy (DOE), the State of Colorado, and the U S Environmental Protection Agency (EPA) on January 22, 1991.

Description of the Selected Remedy No Action

OU16 Low Priority Sites was originally composed of seven Individual Hazardous Substance Sites (IHSSs). The decision for a "No Action" remedy for five of the IHSSs (i.e., 185, 192, 193, 194, and 195) was based upon the NCP which provides for the selection of a No Action alternative when a site or OU is already in a protective state. The Risk Evaluation performed in the Final "No Further Action Justification" document determined that these IHSSs were in a protective state and presented no unacceptable risk to human health and the environment. Further investigation has been recommended for IHSS 196 as part of OU5 and for IHSS 197 as part of OU13.

Declaration Statement

DOE has determined that no remedial action is necessary to be protective of human health and the environment at *Rocky Flats Plant Operable Unit 16 Low Priority Sites*.

Mark N. Silverman, Manager
U S Department of Energy, Rocky Flats Field Office

Date

Jack W. McGraw
Acting Deputy Regional Administrator, Region VIII
U S Environmental Protection Agency

Date

Thomas P. Looby, Director, Office Of Environment,
Colorado Department of Public Health and Environment

Date

Section 1

Decision Summary

A remedy of "No Action" was selected for the Rocky Flats Environmental Technology Site (RFETS) Operable Unit (OU) 16 Low Priority Sites Individual Hazardous Substance Sites (IHSSs) numbered 185, 192, 193, 194, and 195. The risks associated with these IHSSs were assessed using conceptual model analyses. These conceptual model analyses demonstrated that exposure pathways were not completed for IHSSs 185, 192, 193, 194, and 195 because past response actions and/or natural attenuation processes eliminated the source or exposure pathways. Therefore, these IHSSs present no unacceptable risk to human health and the environment.

Site Name, Location, and Description

The Rocky Flats Environmental Technology Site is located north of the City of Golden in northern Jefferson County, Colorado. A copy of a site location map is attached (See Figure 1). Most RFETS structures and OU16 IHSSs are located within the industrialized area of RFETS, which occupies approximately 400 acres. RFETS is surrounded by a buffer zone of approximately 6,150 acres. IHSS 195 is located within the buffer zone (See Fig. 2).

RFETS is located along the eastern edge of the southern Rocky Mountain region, immediately east of the Colorado Front Range. The site is located on a broad, eastward-sloping pediment that is capped by alluvial deposits of Quaternary age (i.e., Rocky Flats Alluvium). The tops of alluvial-covered pediments are nearly flat but slope eastward at 50 to 200 feet per mile (EG&G, 1992). At RFETS, the alluvial-covered pediment surface is dissected by a series of east-northeast trending stream-cut valleys. The bases of the valleys containing Rock Creek, North and South Walnut Creeks, and Woman Creek lie 50 to 200 feet below the elevation of the older pediment surface. These valleys incise into the bedrock underlying alluvial deposits, but most bedrock is concealed beneath colluvial material accumulated along the gentle valley slopes.

Rock Creek, North and South Walnut Creeks, and Woman Creek are intermittent streams that flow generally from west to east and drain excessive water collected at RFETS. Retention ponds are located in each of the creeks downstream of the main site. Rock Creek surface water flows northeast to the Rock Creek confluence with Coal Creek. Surface water within North and South Walnut Creeks, which is not retained within retention ponds used for spill control, flows to Great Western Reservoir. Surface water within Woman Creek, which is not diverted to Mower Reservoir, flows to Standley Lake.

The population, economics, and land use of areas surrounding RFETS are described in a 1989 Rocky Flats vicinity demographics report prepared by the Department of Energy (DOE) (U.S. DOE, 1991b). Land use within 0 to 10 miles of RFETS has been divided within the demographics report into residential, commercial, industrial, parks and open space, agricultural and vacant, and institutional classifications. Most residential use within five miles of RFETS is located immediately northeast, east, and southeast of RFETS. Commercial development is concentrated near residential developments north and southwest of Standley Lake and around Jefferson County Airport, located approximately three miles northeast of RFETS. Industrial land use within five miles of the site is limited to quarrying and mining operations. Natural resources associated with the quarrying and mining activities include gravel and coal. Open-space lands are located northeast of RFETS near

the City of Broomfield and in small parcels adjoining major drainages and small neighborhood parks in the cities of Westminster and Arvada. The west, north, and east sides of Standley Lake are surrounded by open space. Irrigated and nonirrigated croplands, producing primarily wheat and barley, are located north and northeast of RFETS near the cities of Broomfield, Lafayette, Louisville, and Boulder and in scattered parcels adjacent to the east boundary of the site. Several horse operations and small hay fields are located south of RFETS. The demographic report characterizes much of the vacant land adjacent to RFETS as rangeland.

Site History and Enforcement Activities

RFETS is a government-owned, contractor co-operated facility, which is part of the nationwide Nuclear Weapons Complex. The site was operated for the U.S. Atomic Energy Commission (AEC) from its inception during 1951 until the AEC was dissolved during 1975. At that time, responsibility for RFETS was assigned to the Energy Research and Development Administration (ERDA), which was succeeded by DOE during 1977. Previous operations at RFETS consisted of fabrication of nuclear weapons components from plutonium, uranium, and nonradioactive metals (i.e., stainless steel and beryllium).

Various studies were conducted at RFETS to characterize environmental media and to assess the extent of radiological and chemical contaminant releases to the environment. The investigations performed before 1986 were summarized by Rockwell International (1986a). During 1986, two investigations were completed at the site. The first was the DOE Comprehensive Environmental Assessment and Response Program (CEARP) Phase I Installation Assessment (U.S. DOE, 1986). A number of sites that could potentially have adverse impacts on the environment were identified and designated as Solid Waste Management Units (SWMUs) within the CEARP of RFETS. The second investigation involved a hydrogeologic and hydrochemical characterization of RFETS (Rockwell International, 1986d).

On January 22, 1991, a Federal Facility Agreement and Consent Order (i.e., the Interagency Agreement (IAG)) was signed by DOE, EPA Region VIII, and State of Colorado. Within the IAG, the SWMUs were changed to IHSSs and seven IHSSs were assigned to OU16. In addition, the IAG provided guidance and direction for investigating OU16 IHSSs and preparation of the draft and final No Further Action Justification Documents (NFAJDs). The NFAJD for OU16 was defined by the scope of the IAG to fulfill the IAG requirements for submittal of documentation and data necessary to substantiate the cleanup of OU16 IHSSs and/or justify whether further action was required for OU16 IHSSs. Based on the NFAJD prepared for OU16 in accordance with the IAG, "no action" is appropriate for five of the original seven OU16 IHSSs. Based on the approved NFAJD for OU16, further investigation is necessary for IHSS 196 and 197. Subsequently, IHSS 196 was transferred into OU5 and 197 was transferred into OU13 for further investigation.

The IAG scope of work was incorporated in its entirety within the Colorado Hazardous Waste Permit (CHWP) for RFETS. Upon signature of the Record of Decision (ROD) by DOE, EPA, and the State of Colorado, the State shall modify the CHWP for RFETS to incorporate the signed ROD for OU16.

Highlights of Community Participation

A public comment period was held concurrently for the *Proposed Plan and Draft Modification of CHWP for RFP OU16 Low Priority Sites*. The public comment period was held from November 8, 1993, to January 7, 1994, and was extended to February 8, 1994, in response to written public request. A public hearing was conducted on December 8, 1994, during which public comments and questions regarding the *Proposed Plan and Draft Modification of CHWP for RFP OU16 Low*

Priority Sites for OU16 were recorded and have subsequently been responded to within this ROD

Scope and Role of Operable Unit within Site Strategy

The five IHSSs comprising OU16 include IHSS 185 - Solvent Spill, IHSS 192 - Antifreeze Discharge, IHSS 193 - Steam Condensate Leak - 400 Area, IHSS 194 Steam Condensate Leak - 700 Area, and IHSS 195 - Nickel Carbonyl Disposal. All of the IHSSs are located within the industrial area of RFETS, except for IHSS 195 which is located approximately 2,000 feet north of the industrialized area of RFETS (See Fig 2). OU16 IHSSs were grouped together as "low priority sites" within the IAG because of the likelihood that previous actions or natural environmental processes eliminated the need for remedial action. The scope, defined for OU16 IHSSs within Table 5 of the IAG, included submittal of documentation and data required to justify whether further action was required for the IHSSs within OU16. The NFAJD was completed and submitted in accordance with the requirements specified within Table 5 and Table 6 of the IAG.

Site Characteristics

The uppermost water bearing unit at RFETS is unconfined and consists of surficial deposits (i.e., Rocky Flats Alluvium, colluvium, valley-fill alluvium, fill material, and disturbed ground), weathered bedrock units, and subcrops of the Arapahoe and Laramie Formations. The bedrock underlying RFETS can be considered an aquitard. The direction of ground-water flow within the surficial deposits is generally from west to east beneath OU16 IHSSs. Recharge to the surficial water-bearing unit occurs primarily from precipitation. Discharge from the surficial water-bearing unit occurs primarily at minor seeps. Seeps occur in colluvial deposits that cover the contact between the alluvium and bedrock along the edges of the valleys. Discharge also occurs through seepage into other geologic formations and through evapotranspiration.

Based on the conceptual model presented within the NFAJD for OU16, no sources and/or pathways for contamination from OU16 IHSSs exist. A more detailed discussion of each individual IHSS is included within the "Summary of Site Risks" presented below.

Summary of Site Risks

The risks associated with the OU16 IHSSs and the need for further action were assessed using a conceptual model to evaluate the exposure pathways by which contaminants could reach humans. The model is based on the physical setting, the operation, and the nature of hazardous substances. The model describes the sources and types of contamination, environmental media (i.e., soil and ground water), contamination pathways, and the presence of humans (or other living organisms that may be affected). A detailed discussion of past cleanup actions and natural processes that have affected the hazardous substances are described in Section 3 of the Final "No Further Action Justification" document.

An exposure pathway is defined as having four parts: (1) A source of contamination, (2) A release of the contamination, (3) A route for the contamination to reach a human, and (4) A human (or other living organism) population that can be affected. If the exposure pathway is not complete, there is no unacceptable risk to humans or the environment, and no further action is appropriate.

A brief discussion of the conceptual model analysis performed for each IHSS is discussed in the following paragraphs.

IHSS 185, Solvent Spill. Four gallons of 1,1,1 Trichloroethane (TCA) leaked from a 55-gallon drum onto the southeast loading dock of Building 707 and a paved area adjacent to the loading dock on November 10, 1985. A commercial absorbent was used to cleanup the spill. The vapor pressure of TCA at 200C is 13.2 kPa (99 mm Hg. Mackay and Shui, 1981), and

volatilization is rapid (U S EPA, 1979) Also, TCA was not detected in any of the eight ground-water samples collected between November 1989 and April 1992 from monitoring well P218089 The immediate cleanup action of the TCA minimized or potentially eliminated the source of TCA contamination Because the spill occurred on a paved area and the cleanup response action of the source was immediate, the wind dispersion and infiltration transport pathways are eliminated

IHSS 192, Antifreeze Discharge. During December, 1980, a release of 155 gallons of antifreeze containing 25 percent ethylene glycol was diverted into Pond B-1 The drainage system was subsequently flushed with 5,000 gallons of water The concentration of ethylene glycol was diluted below the detection limits by the 5,000 gallons of water that was flushed through the system immediately after the release and by surface water runoff over the past 12 years Also, a degradation model of ethylene glycol showed less than 7 parts per million (ppm) (i e , 250,000 ppm in antifreeze) between twenty to forty days after the contamination occurrence Using this same reasoning, it was predicted that the ethylene glycol related to the 1979 spill has been completely degraded by this time

IHSS 193, Steam Condensate Leak - 400 Area. A steam condensate line containing water with low-level (0.135 milligrams per liter (mg/L)) amines was found to be leaking during November, 1979 The area where the leak occurred was paved at the time of the leak, eliminating the infiltration and wind dispersion pathways The concentration of amines in the steam condensate (0.135 mg/L) was approximately 1 1/2 percent of the permissible exposure limit (PEL) of 10 mg/L Also, the concentration of amines has been diluted by rainfall during the 12 year period since the spill occurred Amines could not be detected, no source of contamination is present

IHSS 194, Steam Condensate Leak - 700 Area A break in a steam condensate line containing a low-level of tritium occurred in the Building 707 area on September 26, 1979 The condensate had a tritium activity of approximately 1,000 pCi/L which was significantly lower than EPA's set public drinking water standard of 20,000 pCi/L (40 CFR Part 141.16)¹ Also, the released tritium has undergone one half-life decay (i e , 12.26 years) since the occurrence of the release This predicts a present-day tritium activity of less than 500 pCi/L This value is within the range of background activities reported for tritium in surface waters at RFETS Tritium associated with this IHSS did not represent an existing source of contamination

IHSS 195, Nickel Carbonyl Disposal. From March through August 1972, cylinders of nickel carbonyl were disposed in a dry well located in the buffer zone The cylinders were opened inside the well and vented with small arms fire to allow decomposition in air Nickel carbonyl is highly volatile and readily decomposes in the presence of oxygen forming nickel oxide Nickel oxide is also highly insoluble in ground water For every gram (0.002 pound) of nickel oxide in contact with typical ground water, approximately 10 micrograms (ug) of nickel per liter of water is transferred to solution EPA's reference dose for nickel in drinking water is 100 ug/L (U S EPA, 1990) Wind dispersion disseminated nickel oxide particles, which would not be detected at concentrations exceeding background

These conceptual model analyses demonstrate that exposure pathways are not completed for IHSSs 185, 192, 193, 194, and 195 Past response actions and/or natural attenuation processes eliminated the source or exposure pathways Future receptors were considered using the conceptual model

¹The State of Colorado statewide standard for tritium is also 20,000 pCi/L (5 Colorado Code of Regulations 1002-8.11.5(c)(2)) If it were applicable, the State of Colorado site-specific standard would be 500 pCi/L (5 Colorado Code of Regulations 1002-8.3.12.0)

analyses to ensure that risk was completely evaluated. Therefore, these hazardous sites do not presently, nor will they in the future, present unacceptable risk to human health and the environment.

Explanation of Significant Changes

No changes in the selected remedy have been made since release of the *Proposed Plan and Draft Modification of Colorado Hazardous Waste Permit for Rocky Flats Plant Operable Unit 16 Low Priority Sites*.

Section 2

Responsiveness Summary

Proposed Plan/Draft Modification of Colorado Hazardous Waste Permit for the Rocky Flats Plant Operable Unit 16 Low Priority Sites

Ronald Harlan, Area Citizen:

Question 1

How was the exposure pathway broken for each of the five sites?

Response to Question 1

The exposure pathway was broken at the source for IHSS 185 since the spill (i.e., four gallons of the solvent 1,1,1 Trichloroethane (TCA)) occurred onto a paved area, the volatilization rate of TCA is inherently high, and a cleanup response action was initiated at the time of the release

The exposure pathway was broken at the source for IHSS 192 because the antifreeze discharged was diluted and evaluation of its degradation indicated that no ethylene glycol could be detected at this time

The exposure pathway was broken at the source for IHSS 193 because the steam condensate release occurred on a paved area, the concentration of amines was relatively low within the steam condensate, precipitation diluted the amines and amines could not be detected at IHSS 193

The exposure pathway was broken at the source for IHSS 194 because the tritium activity of 1000 picocuries per liter (pCi/L) within the steam condensate released was significantly lower than U.S. EPA set drinking water standard for tritium of 20,000 pCi/L. Also the activity of tritium was within the background range for surface water at RFP. In addition, based on the 12.26 year half-life of tritium, less than 500 pCi/l of tritium is estimated to be present today

The exposure pathway was broken at the pathway for IHSS 195 since nickel carbonyl is highly volatile and readily decomposes in the presence of oxygen to form nickel oxide. The concentration of nickel oxide on the ground surface if ejected from the dry well would not be detected above background. Nickel oxide is highly insoluble in ground water and a viable transport pathway does not exist for nickel oxide from the dry well

Question 2

What metals, (within IHSS 197), were there that are of concern?

Response to Question 2

Scrap metal components, primarily from the original plant construction program, were buried within IHSS 197 trenches. In addition, unusable scrap metal such as aluminum and steel associated with the Property Utilization and Disposal yards was disposed of within the trenches. There is a slight possibility that transformers containing polychlorinated biphenyls were disposed within the IHSS 197 trenches also. Buried material was removed from the trenches during 1981. The unearthed material consisted of moist, but not oily, scrap metal such as machine turnings, rings, shapes, overlays, and other metal parts. Transformers or related material were not present in the material excavated from the trenches. Monitoring of materials using a Field Instrument for Detection of Low Energy Radiation (FIDLER) indicated no detectable radioactivity.

Question 3

So what needs investigating--you don't know what was put there, (within IHSS 197), so you?

Response to Question 3

The response to this question provided during the Public Hearing conducted on December 8, 1993, was misstated. Further investigation is warranted at IHSS 197 since the extent of excavation and removal of material from the trenches during 1981 is unknown. Therefore, buried material may still be present within the trenches at IHSS 197 which could be a source of contamination. Since contamination may still be present, exposure pathways may also exist. Additional investigative work must be conducted at IHSS 197.

Question 4

Some day you'll get around to finding out what's there, (within IHSS 197)?

Response to Question 4

Additional investigative work at IHSS 197 is being done as part of the Phase I Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) for Operable Unit (OU) 13. Radiation surveys within IHSS 197 have already been completed as part of the RFI/RI. IHSS 197 was transferred to OU 13 for two reasons: 1) technically the RFI/RI for OU 13 is adequate for addressing potential contamination associated with IHSS 197, and 2) administratively the transfer of IHSS 197 from OU 16 to OU 13 allows the IHSSs remaining in OU 16 to be closed per the Interagency Agreement (IAG).

Question 11

--I just question whether a thousand picocuries per liter, did you say, is a natural background. There is tritium produced in nature, but this sounds a little high.

That's roughly 2,200 disintegrations permitted per liter, and I'm kind of surprised at that.

Comment 4

Well, I think milligrams of tritium would be many curies

Question 12

So five picocuries per liter, (of tritium is considered background)?

Question 13

Okay Of tritium, (500 pCi/l is considered background), in groundwater?

Question 14

I kind of wonder how it, (1000 pCi/l tritium within the steam condensate), got to that high concentration

Comment 5

In steam now--I don't know exactly how steam counts work But let's say that water was being recirculated for many years Tritium--well, water containing tritium is a little heavier than the average water molecule, and maybe over 20 years it would concentrate I don't know

Of course, over 20 years, more than half of it should decay, too, so--

General Response to IHSS 194 questions 11, 12, 13, and 14, and comments 4 and 5.

During the Public Hearing there was confusion regarding IHSS 194, the background activity of tritium, the units in which the activity of tritium is presented, etc A general response approach to IHSS 194 questions and comments was agreed upon by EPA, DOE and CDH in order to ensure that the public's questions and comments regarding IHSS 194 are addressed clearly and that public hearing misstatements are corrected A general response to IHSS 194 questions 11, 12, 13 and 14, and comments 4 and 5 is presented below

Within the Background Geochemical Characterization Report for Rocky Flats Plant (EG&G, 1990) a maximum background activity for tritium during 1989 is reported as 980 picocuries per liter (pCi/l) within Rocky Flats Plant (RFP) surface water Other values of background tritium activity provided in response to Public comments and/or questions during the public hearing held on December 8, 1994, were misstated The activity of tritium within samples of IHSS 194 steam condensate released during 1979 was approximately 1000 pCi/l which does not differ statistically from the reported range of background values (EG&G, 1990) measured during 1989 Additional information regarding background activities of tritium, and sampling that has been conducted, is stated in the No Further Action Justification Document (NFAJD) for OU 16 The NFAJD is available for the public at the various RFP information repositories located in the area

Tritium decays rapidly and has a half-life of 12.26 years. Based on the half-life of tritium, the present day activity of the tritium released during 1979 would be less than 500 pCi/l. The EPA has set a public drinking water standard of 20,000 pCi/l as a maximum for tritium. Therefore, the tritium activity present is at very low concentration and well below standards.

Tritium is usually presented and discussed in units of picocuries (pCi) which is a measurement of activity. Picocuries per liter is an expression of activity concentration. An activity of 27 pCi is equivalent to one (1) disintegration per second (dps). Therefore, steam condensate with an activity concentration of 1000 pCi/l is equivalent to approximately 37 dps per liter (dps/l).

Tritium is both a naturally occurring and man-made isotope of hydrogen and behaves identically to hydrogen when combining with oxygen to form water molecules. As stated above, tritium is usually discussed in terms of an activity versus a weight (i.e., pCi versus milligrams, respectively). One (1) milligram (mg) of steam condensate with an activity of 1000 pCi/l would have an activity equivalent to approximately 10^{-15} curies (Ci). A conversion table for various units used within this general response is provided below.

Tritium behaves identically to hydrogen when combining with oxygen to form water molecules. Tritium is not "dissolved" within water, but is part of the water molecule itself. As a result, tritium is readily transported and highly mobile as a component of surface water, ground water, body fluids, etc. Tritium will not concentrate within water (i.e., steam condensate) because of its mobility as part of and the affinity that tritiated water molecules have for water.

CONVERSION TABLE

$$1 \text{ dps} = 27 \text{ pCi}$$

$$1000 \text{ pCi/l} = 37 \text{ dps/l}$$

$$1 \text{ pCi} = 10^{-12} \text{ Ci}$$

$$1 \text{ mg H}_2\text{O} @ 1000 \text{ pCi/l} = 10^{-15} \text{ Ci} = 0.001 \text{ pCi}$$

Ken Korkia, Technical Assistant for the Rocky Flats Cleanup Commission:

Question 5

Does that mean that under the current situation they, (the four parts of the exposure pathway), have to be complete, or does this take in the hypothetical future uses that could lead to a population that may some day be exposed?

And specifically, I have a thought in mind that if you have an underground or groundwater contamination, and you know that there's definite levels of contamination, but you know that no one is currently using that source of groundwater, would that be a case, then, where you wouldn't have to clean up that source groundwater?

Response to Question 5

Reasonable hypothetical future uses that could lead to a population that may some day be exposed were considered. Specifically, the future use of an aquifer would have to be considered and contamination addressed appropriately to protect the public and the environment. Per the EPA Risk Assessment Guidance for Superfund (RAGS) the exposure assessment included reasonable maximum estimates of exposure for both current and future land-use assumptions. Current exposure estimates were used to determine whether a threat exists based on existing exposure conditions at the site. Future exposure estimates are used to provide decision-makers with an understanding of the potential future exposures and threats and include a qualitative estimate of the likelihood of such exposure occurring.

Question 6

-- What's the source of tritium in that, (IHSS 194), steam condensate?

Response to Question 6

The source of the tritium within the steam condensate is not known. However, the current maximum of 500 pCi/l within the steam condensate is within the reported range of background values (EG&G, 1990) for RFP and is significantly less than the EPA set public drinking water standard of 20,000 pCi/l for tritium. Please refer to the general response provided for questions 11, 12, 13 and 14, and comments 4 and 5 presented above.

Question 7

So, but is this, (1000 pCi/l tritium in steam condensate), higher than normal?

Response to Question 7

Please refer to the general response provided for questions 11, 12, 13 and 14, and comments 4 and 5 presented above.

Question 8

--is this just naturally occurring in all the steam that's at Rocky Flats that you would find the tritium?

Response to Question 8

Please refer to the general response provided for questions 11, 12, 13 and 14, and comments 4 and 5 presented above.

Question 9

Because my concern is, then, that every place--I'm sure you've had other steam leaks over the past with all the miles of pipe that you must have out there, and so that was this only one example that was pulled up, or why are other areas where there were leaks aren't being considered for this same contamination?

Response to Question 9

When the IAG was negotiated the only steam condensate leak identified as a potential concern with regard to tritium was the IHSS 194 release. However, it was agreed by EPA, CDH and DOE that a mechanism to address past and future releases needed to be in place within the IAG. The mechanism that was agreed upon is the Historical Release Report (HRR). The HRR is updated every three months to include newly identified or suspected releases for which DOE has notified EPA and the State during the previous three months. The HRR is available to the public at the public information repositories for Rocky Flats Plant.

Question 10

If a steam leak were to occur today, would it be standard procedure to do a radionuclide specific testing on that to see if there was tritium, plutonium, uranium in the steam?

Response to Question 10

All detected releases at RFP are investigated. Steam condensate which is accidentally released within an IHSS is sampled, and the appropriate response is made. Standard Operating Procedures (SOPs) for reporting and mitigating releases are in place at Rocky Flats Plant in compliance with RCRA and the Colorado Hazardous Waste Permit for RFP. However, steam condensate is not considered a hazardous waste. Tritium, plutonium and uranium are not automatically included with regard to steam condensate leak sampling unless a potential for tritium, plutonium and uranium contamination exists. The steam system(s) at RFP where a potential for tritium, plutonium and uranium contamination exists are designed to maintain a "safety envelope" to prevent potentially contaminated steam from escaping. A safety envelope is created by maintaining relatively greater steam pressures outside areas where a potential for tritium, plutonium and uranium contamination exists.

Comment 1

Well, I hope there's a little more information in the full document about tritium.

Response to Comment 1

Additional information regarding tritium is available within the No Further Action Justification Document for OU 16 which is available for the Public at the RFP Information Repositories.

Comment 2

And just a closing comment, I guess that I know this is our first operable unit where we've really gotten this far down where there actually have been decisions made, and I guess it's wishful on my part, but I hope that all the documents will be as easy to read and to comprehend, and that the decisions will be as easy to make. But I seriously doubt that will be the case, but we can only hope.

Response to Comment 2

The DOE acknowledges the support for the format and content of the Proposed Plan/Draft Modification of the Colorado Hazardous Waste Permit for Rocky Flats Plant Operable Unit 16 Low Priority Sites.

Comment 3

I commend the authors of this, especially the inclusion of the glossary and just the explanation of everything was easy to comprehend. Thanks.

Response to Comment 3

The DOE acknowledges the support for the format and content of the Proposed Plan/Draft Modification of the Colorado Hazardous Waste Permit for Rocky Flats Plant Operable Unit 16 Low Priority Sites.

Appendix A – Acronym List

RFETS	The Rocky Flats Environmental Technology Site
OU	Operable Unit
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
SARA	Superfund Amendments and Reauthorization Act
CHWA	Colorado Hazardous Waste Act
NCP	National Oil and Hazardous Substances Pollution Contingency Plan (National Contingency Plan)
NFAJD	No Further Action Justification Document
DOE	Department of Energy
EPA	Environmental Protection Agency
IHSS	Individual Hazardous Substance Site
AEC	Atomic Energy Commission
ERDA	Energy Research and Development Administration
CEARP	Comprehensive Environmental Assessment and Response Program
SWMU	Solid Waste Management Unit
IAG	Interagency Agreement
CHWD	Colorado Hazardous Waste Permit
ROD	Record of Decision
TCA	Trichloroethane
PEL	Permissible Exposure Limit
ppm	part per million
pCi	picocuries
pCi/L	picocuries per liter
ug	micrograms

mg	milligrams
mg/L	milligrams per liter
PU&D	Property Utilization and Disposal
RCRA	Resource Conservation and Recovery Act
FIDLER	Field Instrument for Detection of Low Energy Radiation
RFI/RI	RCRA Facility Investigation/Remedial Investigation
dps	disintegrations per second
L	liter
CDPHE	Colorado Department of Public Health and Environment
dps/L	disintegrations per second per liter
C ₁	curies
RAGS	Risk Assessment Guidance for Superfund
HRR	Historical Release Report
SOP	Standard Operating Procedure

Appendix B – References

EG&G, 1992: EG&G Rocky Flats, Inc , “Phase I Geologic Characterization Data Acquisition – Surface Geologic Mapping of the Rocky Flats Plant and Vicinity, Jefferson and Boulder Counties, Final Report,” Golden, Colorado, March 1992

EG&G, 1991b: EG&G Rocky Flats, Inc , “Phase II Geologic Characterization, Task 6 Surface Geologic Mapping Draft Report,” Golden, Colorado, May 1991

Mackay, D., 1991: *Multimedia Environmental Models – The Fugacity Approach*, Lewis Publishers, Chelsea, Michigan

Rockwell International, 1986a: Rockwell International, “Geologic and Hydrological Data Summary, U S Department of Energy, Rocky Flats Plant, Golden, Colorado,” Golden, Colorado, July 21, 1986

Rockwell International, 1986d: Rockwell International, “Resource Conservation and Recovery Act Part B – Post Closure Care Permit Application for U S Department of Energy, Rocky Flats Plant, Hazardous and Radioactive Mixed Wastes,” U S Department of Energy, unnumbered report, 1986

U.S. EPA, 1990: Health Effects Assessment Summary Tables, EPA Office of Research and Development/Office of Emergency and Remedial Response, OSWER (OS-230)/OERR 9200/6-303/90-4, September 1990

U.S. EPA, 1979: U S Environmental Protection Agency, Callahan, M A , et al , “Water Related Fate of 129 Priority Pollutants,” EPA-440/4-79-029b, December 1979

U.S. DOE, 1986: U S Department of Energy, “Comprehensive Environmental Assessment and Response Program Phase I Draft Installation Assessment, Rocky Flats Plant,” Washington, D C , DOE unnumbered draft report, 1986

**Responsiveness Summary for
U.S. Environmental Protection Agency Comments**

on the

**Draft Corrective Action Decision/Record of Decision (CAD/ROD)
Declaration Rocky Flats Plant
Operable Unit 16: Low Priority Sites**

Comment 1

Statement of Basis and Purpose, third sentence Delete word "which "

Response to Comment 1

The appropriate response has been incorporated in CAD/ROD

Comment 2

Description of the Selected Remedy No Action The text needs to clarify the following (1) OU16 is composed of seven IHSSs, (2) no action was found necessary for five IHSSs (i.e., 185, 192, 193, 194, and 195), and (3) further investigation has been recommended for IHSSs 196 and 197 to be conducted as part of OU5 and OU13 The appropriate response has been incorporated in CAD/ROD

Response to Comment 2

The appropriate response has been incorporated in CAD/ROD

Comment 3

Second Sentence Replace Risk Assessment Analysis with "Risk Evaluation "

Response to Comment 3

The appropriate response has been incorporated in CAD/ROD

Comment 4

Declaration Statement Delete everything after first sentence

Response to Question 4

The appropriate response has been incorporated in CAD/ROD

Comment 5

Signatures Replace EPA signature William P Yellowtail with Jack W McGraw

Response to Question 5

The appropriate response has been incorporated in CAD/ROD

Comment 6

Site Name, Location, and Description, fourth paragraph, second to the last sentence Spelling Easter, should be east

Response to Question 6

The appropriate response has been incorporated in CAD/ROD

Comment 7

Site History and Enforcement Activities, third paragraph First sentence, add comma (,) after 1991 Second sentence, add "to" OU16

Response to Question 7

The appropriate response has been incorporated in CAD/ROD

Comment 8

Fourth paragraph, spelling "preparation " Correction needed

Response to Question 8

The appropriate response has been incorporated in CAD/ROD

Comment 9

The text needs to explain what the NFAJD is

Response to Question 9

The appropriate response has been incorporated in CAD/ROD

Comment 10

Highlights of Community Participation There are several grammatical mistakes in this sentence These need to be corrected

Response to Question 10

The appropriate response has been incorporated in CAD/ROD by adding commas after the dates

Comment 11

Summary of Site Risks, IHSS 185 through 195 The text needs to include more detailed information regarding the following (1) what was spilled, (2) when, (3) how much, and (4) what response action was conducted

Response to Question 11

The appropriate response has been incorporated in CAD/ROD

Comment 12

IHSS 195, Steam Condensate Leak – 700 Area Provide reference for the standard of 20,000 pCi/L

Response to Question 12

The appropriate response has been incorporated in CAD/ROD

Comment 13

Responsiveness Summary, Question 5 Response Correct response to specify if institutional controls are needed for this IHSS

Response to Question 13

The Responsiveness Summary for the Proposed Plan for OU16 has been included in the Draft ROD as a "Final" document and should not be changed. In addition, for the technical reasons discussed below, institution controls should **not** be specified as suggested by EPA.

DOE prefers to address Question 5 using the explanation of the conceptual model and RAGS. Institutional controls would be only one type of remedy which could be selected depending upon the scenario provided. Specifying a remedy (i.e., institutional controls) for a hypothetical scenario is inappropriate since the technical details of the hypothetical scenario are unknown. In addition, the Public may confuse the hypothetical scenario with reality and confuse the hypothetical remedy (i.e., institutional controls) with the no action remedy selected for OU16.

**Responsiveness Summary for
Colorado Department of Public Health and
Environment Hazardous Materials and Waste Management
Division Comments**

on the

**Draft Record of Decision Declaration
Rocky Flats Plant Operable Unit 16: Low Priority Sites**

Comment 1

Title of Decision Document – This document is intended to record the selection of remedial action at OU16 under CHWA and CERCLA authority. The title of this document should accurately reflect the scope of this decision. Per Section XIII, page 42 of the IAG statement of work, the title of this decision document should be, "Corrective Action Decision/Record of Decision Declaration."

Response to Comment 1

The title of the document has been changed.

Comment 2

State of Colorado Signature – The signature block for State concurrence on the CAD/ROD should be for signature by Tom Looby, Director, Office of Environment, Colorado Department of Public Health and Environment. Please note the Colorado Department of Health's name was changed to the Colorado Department of Public Health and Environment on July 1, 1994.

Response to Comment 2

The appropriate response has been incorporated in CAD/ROD.

Comment 3

Site Geology Description – The Section Site Name, Location, and Description contains the sentence, "The pediment surface has a fan like form, with its apex and distal margins approximately two miles west of RFP." The term "apex" and "distal" generally apply to an alluvial fan such as the Rocky Flats Alluvium, not to the pediment surface the fan rests upon. If the pediment surface has a fan-like form, it is because of the protection from erosion provided by the alluvial fan. Furthermore, the term "distal" means the terminal edge of the fan which **does not** occur two miles west of RFP. The alluvial fan and the pediment surface are dissected and portions of them terminate within RFP boundaries.

Response to Comment 3

The sentence, "The pediment surface has a fan like form, with its apex and distal margins approximately two miles west of RFP" has been deleted and the appropriate response has been incorporated in the CAD/ROD

Comment 4

Water Quality Standards at IHSS 194 – The 700 area groundwater is in the Rocky Flats Alluvium and possibly Quaternary colluvial deposits and, therefore, carries a surface water protection classification from the site specific classification (Classification and Water Quality Standards for Groundwater" 3 12 0 CCR 1002-6) The applicable standard for tritium is 500 pCi/L, not the 20,000 pCi/L EPA drinking water standard Since tritium associated with this release does not represent an existing source of contamination, this standard will not impact the no action decision However, the Division requests that the state water quality standard for tritium be added to the discussion of the summary of site risks for IHSS 194

Response to Question 4

The NFAJD, Proposed Plan/Draft Modification of CHWP for RFP OU16 Low Priority Sites and Responsiveness Summary to Public Comments on the Proposed Plan for OU16 have been finalized and approved by DOE, EPA, and CDPHE The EPA set Public drinking water standard of 20,000 pCi/L has been approved within those documents by CDPHE as the appropriate standard The State of Colorado statewide standard is also 20,000 pCi/L A footnote reference to the existence of a State of Colorado site-specific standard is presented within the ROD but has not been approved as, nor is applicable as, a standard for RFETS

Comment 5

Protectiveness of Future Receptors – The Division requests that language be added to the summary of site risks clarifying that future receptors were considered in the conceptual model

Response to Question 5

The appropriate response has been incorporated in CAD/ROD

Comment 6

Page Numbering – The Division recommends that page numbers be added to the Final CAD/ROD

Response to Question 6

The appropriate response has been incorporated in CAD/ROD